

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 20017, 20025, 20026, 25076, 25105 &
25107

CERTIFICATION OF COUNSEL

I, Kimberly A. Brown, counsel to FTX Recovery Trust,² hereby certify as follows to the best of my knowledge, information and belief:

1. On June 26, 2023, North Field Technology Ltd. (“North Field” and together with the FTX Recovery Trust as the “Parties”) filed Claims 3310, 3321, 3328, and 3357 against Alameda Research LLC, FTX Trading Ltd., Maclaurin Investments Ltd., West Realm Shires Services Inc., respectively. On June 26, 2023, North Field also filed Claims 3285, 3496, and 3800 against Debtors West Realm Shires Financial Services Inc., FTX Trading, and WRSS, respectively.

2. On July 10, 2024, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) filed the *Debtors’ Objection to Proofs of Claim Filed by North Field Technology Ltd.* [D.I. 20017] (the “Claims Objection”), the *Declaration of Steven P. Coverick in*

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

Support of Debtors' Objection to Proof of Claim Filed by North Field Technology Ltd. [D.I. 20025] and the *Declaration of Bruno Requiao Da Cunha in Support of Debtors' Objection to Proof of Claim Filed by North Field Technology Ltd.* [D.I. 20026].

3. On September 18, 2024, North Field filed the *Response of North Field Technology Ltd. to Debtors' Objection to Proofs of Claim Filed by North Field Technology, Ltd.* [D.I. 25076] and a *Declaration of Roman Bieda* in support thereof [D.I. 25105], along with the *Motion of North Field Technology Ltd. for Entry of an Order (I) Granting Relief from the Automatic Stay; (II) Waiving Bankruptcy Rule 4001; and (III) Granting Related Relief* [D.I. 25107] (the "Stay Relief Motion" and, together with the Claims Objection, the "Contested Matters").

4. The Parties have conferred and agreed to a proposed schedule to govern the Contested Matters (the "Scheduling Order"), a copy of which is attached hereto as **Exhibit A**.

5. The Parties have no objection to the entry of the Scheduling Order. In accordance with the Court's electronic order processing procedures, a copy of the Scheduling Order shall be uploaded to CM/ECF.

6. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Scheduling Order at its earliest convenience.

Dated: February 13, 2025
Wilmington, Delaware

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/s/ Kimberly A. Brown

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